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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
Plaintiff,
13
v.
14 MARIO ALBERTO BOJORQUEZ-
15 MANRIQUE,
16
Defendant.

Case No. 2:19-cr-00153-APG-DJA

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(Fourth Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Robert Knief, Assistant United States Attorney, counsel
20 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
21 Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Mario Alberto
22 Bojorquez-Manrique, that the pretrial motions deadlines be continued thirty (30) days.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including February 3, 2020, to file any and all pretrial motions and notice of
25 defense, currently due January 2, 2020.
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including February 17, 2020, to file any and all responsive pleadings, currently
3 due January 16, 2020.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including February 24, 2020, to file any and all replies to dispositive motions,
6 currently due January 23, 2020.

7 1. Counsel for the defendant needs additional time to conduct investigation in this
8 case in order to determine whether there are any pretrial issues that must be litigated and
9 whether the case will ultimately go to trial or will be resolved through negotiations.

10 2. The defendant is incarcerated and does not object to the continuance.

11 3. The parties agree to the continuance.

12 4. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow counsel for defendant sufficient time within which to be able to effectively and
14 complete investigation of the discovery materials provided.

15 5. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice.

17 This is the fourth stipulation to continue filed herein.

18 DATED this 4th day of January, 2020.

19 RENE L. VALLADARES
20 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

21 By /s/ Margaret W. Lambrose

21 By /s/ Robert Knief

22 MARGARET W. LAMBROSE
23 Assistant Federal Public Defender

22 ROBERT KNIEF
23 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 MARIO ALBERTO BOJORQUEZ-
MANRIQUE,

8 Defendant.

Case No. 2:19-cr-00153-APG-DJA

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to conduct investigation in this
14 case in order to determine whether there are any pretrial issues that must be litigated and
15 whether the case will ultimately go to trial or will be resolved through negotiations.

16 2. The defendant is incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to be able to effectively and
20 complete investigation of the discovery materials provided.

21 5. Additionally, denial of this request for continuance could result in a miscarriage
22 of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including **February 3, 2020**, to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including **February 17, 2020**, to file any all responses.

IT IS FURTHER ORDERED that the parties shall have to and including **February 24, 2020**, to file any and all replies.

Dated: January 6, 2020.



UNITED STATES DISTRICT JUDGE